

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,

v.

ANGELA SAUCIDO,
Defendant.

NO. CR15-5096BHS

DISCOVERY PROTECTIVE ORDER

This matter, having come to the Court's attention through the parties' Stipulation for Entry of a Discovery Protective Order, and the Court, having considered the motion and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Protected Material

The following documents and materials are deemed Protected Material. The United States will make available copies of the Protected Material, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Material is limited to the attorneys of record, and investigators, paralegals, law clerks, experts, and assistants for the attorneys of record (hereinafter collectively referred to as members of the defense team). The following Protected Material will be marked and labeled as "Protected Material":

- a. Grand Jury transcripts and exhibits.
- b. Victim/Witness statements, including but not limited to, reports of law enforcement officers memorializing witness/victim statements, and audio/video recordings of interviews of victims and witnesses.

1 c. Records, reports, digital data, and documents containing business,
2 financial, or other sensitive information belonging to the victims and witnesses in this
3 case.

4 d. Personal information belonging to victim/witnesses and any material
5 containing their personal information.

6 As used in this Order, the term “personal information” includes the full name of
7 each victim and witness, their dates of birth, Social Security number (or other
8 identification information), driver’s license number, address, telephone number, location
9 of residence or employment, financial information, employment records, medical records,
10 school records, criminal records, and other confidential information.

11 2. Scope of Review of Protected Material

12 The attorneys of record and members of the defense team may display to and
13 review the Protected Material with Defendant. The attorneys of record and members of
14 the defense team acknowledge that providing copies of the Protected Material to
15 Defendant and other persons is prohibited and agree not to duplicate or provide copies of
16 Protected Material to Defendant or any other person, except as provided in Paragraph 1.

17 The United States Attorney’s Office for the Western District of Washington is
18 similarly allowed to display and review the Protected Material to/with lay witnesses, but
19 is otherwise prohibited from providing copies of the Protected Material to lay witnesses,
20 *i.e.* non-law enforcement witnesses.

21 3. Parties’ Reciprocal Discovery Obligations

22 Nothing in this order should be construed as imposing any discovery obligations
23 on the government or the defense that are different from those imposed by case law and
24 Rule 16 of the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

25 4. Filing of Protected Material

26 Any Protected Material that is filed with the Court in connection with pre-trial
27 motions, trial, sentencing, or other matter before this Court, shall be filed under seal and
28 shall remain sealed until otherwise ordered by this Court. This does not entitle either

1 party to seal their filings as a matter of course. The parties are required to comply in all
2 respects to the relevant local and federal rules of criminal procedure pertaining to the
3 sealing of court documents.

4 5. Nontermination

5 The provisions of this Order shall not terminate at the conclusion of this
6 prosecution.

7 6. Violation of Protective Order

8 Any violation of any term or condition of this Order by Defendant, Defendant's
9 attorney(s) of record, any member of the defense team, or any attorney for the
10 United States Attorney's Office for the Western District of Washington, may be held in
11 contempt of court, and/or may be subject to monetary or other sanctions as deemed
12 appropriate by this Court.

13 If Defendant violates any term or condition of this Order, the United States
14 reserves its right to seek a sentencing enhancement for obstruction of justice, or to file
15 any criminal charges relating to Defendant's violation.

16 DATED this 1st day of April, 2015.

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BENJAMIN H. SETTLE
United States District Judge

Presented by:

/s/ Matthew P. Hampton

MATTHEW P. HAMPTON
Assistant United States Attorney

/s/ Linda Sullivan

LINDA SULLIVAN
Assistant Federal Public Defender